

1 CRAIG H. MISSAKIAN (CABN 125202)
United States Attorney

2 MARTHA BOERSCH (CABN 126569)
3 Chief, Criminal Division

4 ABRAHAM FINE (CABN 292647)
MOLLY PRIEDEMAN (CABN 302096)
5 LLOYD FARNHAM (CABN 202231)
Assistant United States Attorneys

6 1301 Clay Street, Suite 340S
7 Oakland, California 94612
Telephone: (510) 637-3717
8 FAX: (510) 637-3724
Abraham.fine@usdoj.gov
9 Molly.priedeman@usdoj.gov
Lloyd.farnham@usdoj.gov

10 Attorneys for United States of America

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 SHENG THAO,
ANDRE JONES,
19 DAVID TRUNG DUONG, AND
20 ANDY HUNG DUONG,

21 Defendants.

) CASE NO. 25-CR-0003-YGR
)

) **UNITED STATES' MOTION FOR LEAVE TO**
) **FILE OPPOSITION BRIEF WITH EXCESS**
) **PAGES AND [PROPOSED] ORDER**
)

1 Defendants Sheng Thao, Andre Jones, Andy Duong, and David Duong (“Defendants”) have filed
2 four separate motions to a *Franks* hearing suppress the fruits of four different search warrants. *See* Dkt.
3 Nos. 119, 136, 138, 141. Specifically, Defendants move for a *Franks* hearing and to suppress the fruits
4 of the June 2024 search warrant executed on their residences and also seek to partially suppress the
5 fruits of three separate electronic data warrants issued in February, March, and May of 2024 related to
6 cell phone data and iCloud and email accounts. *Id.* While many of Defendants’ arguments overlap,
7 some assertions are unique to individual Defendants. In total, Defendants’ four sets of motions
8 comprise 86 pages of briefing, along with hundreds of pages of exhibits and declarations.

9 The government submits that the most efficient and coherent way to respond Defendants’
10 various motions is to file one comprehensive opposition brief. Given the length of Defendants’ briefing,
11 the various individual arguments they make, and the number of warrants Defendants are challenging, the
12 government needs additional pages to adequately respond to Defendants’ motions to suppress and to
13 partially suppress the fruits of those warrants. Accordingly, the government respectfully requests,
14 pursuant to Criminal Local Rule 47-2 and Civil Local Rules 7-4 and 7-11, that it be permitted to submit
15 a comprehensive opposition brief of 40 pages in response to Defendants’ various motions to suppress
16 the fruits of the June 2024 residential search warrants and for partial suppression relating to the
17 February, March, and May of 2024 warrants for Defendants’ iCloud accounts, cell phone data, and
18 email accounts.

19
20 DATED: January 14, 2026

Respectfully submitted,

21 CRAIG H. MISSAKIAN
22 United States Attorney

23 /s/_____
24 ABRAHAM FINE
25 MOLLY K. PRIEDEMAN
26 LLOYD FARNHAM
27 Assistant United States Attorneys
28

[PROPOSED] ORDER

Good cause shown, the government's motion for excess pages to respond to Defendants' motions to suppress is GRANTED.

IT IS SO ORDERED.

DATED: _____

HON. YVONNE GONZALEZ ROGERS
United States District Judge